

DAVID Y. IGE
GOVERNOR OF
HAWAII



**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD., STE 555
KAPOLEI, HI 96707

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BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

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October 25, 2019

Kathy Sokugawa, Acting Director
Department of Planning and Permitting
City and County of Honolulu
One Main Plaza Building
650 South King Street
Honolulu, Hawaii 96813

IN REPLY REFER TO:
Log No. 2019.01705
Doc. No. 1910AM02
Archaeology

Dear Ms. Sokugawa:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –
Mass Grading, Phase 1A – Permit Number GP2017-10-0488
Interim Protection Measures Implementation Report #1 for the Castle & Cooke
Hawai'i, Inc. Koa Ridge Project
Waipi'o Ahupua'a, 'Ewa District, Island of O'ahu
TMK: (1) 9-4-006:002 por.**

This letter provides the State Historic Preservation Division's (SHPD's) review of the draft report titled *Interim Protection Measures Implementation Report for the Koa Ridge Project Addressing SIHP # -9530 Feature A, Kipapa Ditch, at Offsite Drain Line Crossing 1, Waipi'o Ahupua'a, 'Ewa District, O'ahu TMK: [1] 9-4-006:002 por* (Belluomini and Hammatt, July 2019). SHPD concurred with the Castle & Cooke Homes Hawai'i, Inc. tentative schedule for verification of completion of the mitigation plans for the Koa Ridge Project in a letter dated May 21, 2018 (Log No. 2018.00897, Doc. No. 1805SL01). SHPD received the submittal produced by Cultural Surveys Hawai'i, Inc. (CSH) documenting the implementation of the subject interim protection measures on August 2, 2019. SHPD requested minor revisions to the report via email on September 26, 2019 (Andrew McCallister [SHPD] to David Shideler [CSH]) and received the revised report via email on October 3, 2019 (Scott Belluomini [CSH] to Andrew McCallister).

The Castle & Cooke Koa Ridge project is a private project funded by Castle & Cooke Hawaii Inc. The overall project area totals 576 acres. The project scope of work includes installation of appurtenances including storm drains and sewer lines, to serve Castle & Cooke's Koa Ridge Makai development. The Koa Ridge Makai development will create a master-planned community with low-, medium-, and high-density residential units, park sites, recreation centers, schools, an integrated mixed-use village center with commercial, light industrial, hotel, and health-care components.

Pursuant to HAR §13-284-3(b)(6), Castle & Cooke Homes Hawai'i, Inc. (C & C) proposed a tentative schedule for verification of completion of the mitigation plans (Table 1). Interim protection measures are detailed in the project's preservation plan (Shideler and Hammatt 2018b). This includes interim protection measures for State Inventory of Historic Places (SHIP) Sites #50-80-09-2268, #50-80-09-7046, #50-80-09-7047 Features A-G, #50-80-09-7050 Feature C, #50-80-09-7053 Feature A, and three portions of SIHP Site # 50-80-09-9530 Feature A. The preservation plan indicates that prior to work in the vicinity of these historic properties, the interim protection measures are to be implemented, and documentation of implementation are to be provided to the SHPD.

Per the SHPD-approved tentative schedule for verification of completion of mitigation plans (May 21, 2018; Log No. 2018.00897, Doc. No. 1805SL01), Castle & Cooke Homes Hawai'i, Inc. has submitted this draft Interim

Protection Measure (IPM) Implementation Report #1. This report documents the installation of protective measures and land survey markers prior to the demolition the SIHP # 50-80-09-9530, Feature A, Drain Line No. 1 Crossing.

Table 1. Interim protection measure (IPM) report deliverables and estimated schedule of completion

Report	Historic Property and Location	Requirements	Estimated Completion
IPM Implementation Report# 1	SIHP # -9530 Feature A Offsite (southern) Drain Line No. 1 Crossing	Documentation of installation of protective measures and land survey markers prior to demolition for crossing	2019
IPM Implementation Report# 2	SIHP # -9530 Feature A for proposed filling of two small valleys	Documentation of installation of protective measures and land survey markers prior to demolition	2019
IPM Implementation Report# 3	SIHP #s -7046, -7047 Features A-G, and- 7050 Feature C	Documentation of installation of protective measures and land survey markers prior to work in the vicinity	2021
IPM Implementation Report# 4	SIHP #-2268	Documentation of installation of protective measures and land survey markers prior to partial demolition	2022
IPM Implementation Report# 5	SIHP # -7053 Feature A	Documentation of installation of land survey markers	2022
IPM Implementation Report# 6	SIHP # -9530 Feature A Offsite (northern) Drain Line No. 2 Crossing	Documentation of installation of protective measures and land survey markers prior to demolition	2022

CSH archaeologists installed the IMPs for SIHP Site # 50-80-09-9530, Feature A on May 13-14, 2019. A protective barrier of high visibility, orange web “event fencing” was placed at the ends of the ditch to demarcate the area of construction activity. Fencing was erected perpendicularly crossing the ditch as a visual and physical barrier showing where the approved disturbance to SIHP Site #50-80-09-9530 Feature A can occur (between the two fences). The two preservation buffer zone boundaries were created at either end of the ditch marking the area of construction activity. The ditch in this area consists of the formal, stone-lined ditch (SIHP Site #50-80-09-9530 Feature A) and a remnant of an earthen ditch just west of SIHP Site #50-80-09-9530 Feature A between the ditch and Kamehameha Hwy. Five posts were hand-driven into the ground to support the 1.21-m (4-ft) tall “event fencing.”

At the southeast end of SIHP Site #50-80-09-9530 Feature A, two posts were hand-driven into the ground. One post was driven into the soil either side of the upper ditch. The “event fencing” was then pulled over the ditch and fastened to the two posts. The two posts were placed 4 m apart, and the additional fence extends 3 m over the lower ditch (earthen ditch remnant), totaling 7 m in all.

At the northwest end of SIHP Site #50-80-09-9530 Feature A, three posts were hand-driven into the ground. One post was driven into the soil on either side of the upper ditch, and one on the far side of the lower ditch. The fence was then pulled over the ditch and fastened to the three posts. The two posts at the upper ditch were placed 4 m apart; the third post was placed 3 m from the second post, totaling 7 m in all.

GPS points of all five posts were collected for the purposes of recording the construction buffer zone. Permanent land survey markers (SIHP Sites #50-80-09-4125, #50-80-09-4130, #50-80-09-4131 and #50-80-09-4132) were installed by a licensed surveyor (Park Engineering) on 9 July 2019 at the location of Offsite Drain Line No. 1 where the project area boundary crosses SIHP # Site 50-80-14-9530 Feature A.

SHPD hereby notifies the County and Castle & Cooke Homes Hawai‘i, Inc. that the IPM Implementation Report #1, for the SIHP Site #50-80-09-9530 Feature A, Offsite (southern) Drain Line No. 1 Crossing provides adequate verification of the required implementation of interim protection measures for the subject historic

properties. Additionally, **the SHPD has determined that project initiation may begin in compliance with provisions stated in the Permit Number GP2017-10-0488 (Mass Grading, Phase 1A) issued by the City and County of Honolulu, Department of Planning and Permitting (DPP).**

The SHPD anticipates receiving written notification of project initiation.

SHPD also looks forward to the review and acceptance of the IPM Implementation Report #2, for SIHP Site # 50-80-09-9530 Feature A, prior to the initiation of construction activities associated with the proposed filling of the two small valleys adjacent to the site.

Please contact Andrew McCallister, Historic Preservation Archaeologist III, at Andrew.McCallister@hawaii.gov or at (808) 692-8010 for matters regarding archaeological resources or this letter.

Aloha,

Alan Downer

Alan S. Downer, PhD

Administrator, State Historic Preservation Division

Deputy State Historic Preservation Officer

cc: W. Bruce Barrett, Executive Vice President, Residential Operations
Castle & Cooke Homes Hawaii, Inc., barrett@castlecooke.com
Daniel E. Orodener, Executive Officer, Land Use Commission, State of Hawaii, dbedt.luc.web@hawaii.gov
Suzanne D. Case, Chairperson, DLNR, Suzanne.case@hawaii.gov
Robert K. Masuda, First Deputy, DLNR, robert.k.masuda@hawaii.gov
Garret Matsunami, Castle & Cooke Homes Hawaii, Inc., gmatsunami@castlecooke.com
Laura Kodama, Castle & Cooke Homes Hawaii, Inc., lkodama@castlecooke.com
Wallace Carvalho, DPP, wcarvalho@honolulu.gov
Kanani Padeken, DPP, kpadeken@honolulu.gov
Perry Tamayo, DPP, ptamayo@honolulu.gov
David Shideler, CSH, dshideler@culturalsurveys.com